

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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Federal Communications Commission
Office of Secretary

In the Matter of)
)
Request Of The United States)
Department Of Justice That 311)
Be Reserved For Use By Communities)
For Non-Emergency Police Telephone Calls)

CC Docket No. 92-105
DA 96-1500

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NYNEX COMMENTS

The NYNEX Telephone Companies¹ (NYNEX) submit these Comments in response to the Commission's Public Notice released September 10, 1996, in the above-captioned matter. That Public Notice has invited comment on a request by the United States Department of Justice's Office of Community Oriented Policing Services (DOJ) (by letter dated August 26, 1996) that an N11 code, specifically 311, be reserved on a national basis for use by communities for non-emergency police telephone calls. The DOJ suggested that the N11 code could be used to give access to other government services, at the discretion of each jurisdiction.

NYNEX has long supported the use of N11 codes to serve the greater public interest. NYNEX also supports the present initiative to create a national non-emergency number. However, NYNEX has reservations about the use of an N11 code for this

¹ New England Telephone and Telegraph Company and New York Telephone Company.

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purpose. We are concerned that another N11 code could be too easily confused with 911. Non-emergency calls to 911 are a problem, but emergency calls to a non-emergency number (such as 311) could lead to delayed responses and be life-threatening.

NYNEX has a particular concern with the suggested use of 311. The 311 code has been in use by NYNEX and the other 40 telephone companies serving New York State, since October 1994, as an emergency access number for hearing and speech impaired citizens in the State.

The national 911 code is used in about 50 of the 60 counties of New York State. The remaining counties have yet to order 911 service. For these counties, 911 calls are routed to local telephone operators who may not be equipped to answer a Text Telephone (TTY) call. In accordance with State and federal requirements, all 911 sites are equipped with the ability to answer TTY calls. However, with nearly 300 answering sites for 911, the expertise needed to recognize a TTY call and answer in time or in a manner which the TTY caller can recognize, is not always certain. In addition, with some county 911 systems, an automatic call distributor is used which places 911 calls in queue while awaiting the next available attendant. While in queue, hearing customers are provided with a recorded announcement asking them to hold on, but customers calling with a TTY believe that their call is not being answered.

Throughout New York State, there were repeated complaints from the hearing and speech impaired community regarding usability of 911 service on all occasions. As a result, the New York State Police, New York State Public Service Commission and telephone carriers agreed to activate the 311 code for Statewide use by the hearing and

speech impaired population for emergency calls. Calls to 311 have been answered by the New York State Police at their headquarters site in Albany, New York. The State Police answer all 311 calls with a TTY. No voice is used on the calls. Calls are then referred to the State Police, New York City, town or county police, fire or ambulance as appropriate.

This 311 service to the hearing and speech impaired citizens in New York State has been highly successful. NYNEX is concerned that this population (of at least 25,000 people), which has been educated to call 311 in an emergency, will be put at risk if 311 is changed to a non-emergency number. Each day, there are about 2 or 3 calls to 311 concerning life-threatening situations.

As an alternative for non-emergency calls, an easily remembered interchangeable Numbering Plan Area (INPA) 3-digit code could be used.² Codes that could be considered include: 222, 333, 444, 777, 933, 966, 977 and 988. Conflicts between the INPA and an NXX could be resolved through inter-digital timing. That is, switches would be programmed to wait a few seconds³ after the 3-digit code is dialed to see if additional digits are dialed (in which case the call would be processed as a call to an NXX number). If no additional digits are dialed, the call would be processed as a call to the non-emergency INPA number. Only the particular 3 digit code being used for non-emergency calls would be affected.

² The Commission could also consider the use of an easily remembered 888 number.

³ Since this is a non-emergency call, a few seconds delay should not be a concern. Alternatively, a prefix digit such as "*", "#", or "1" (e.g. *NXX) could be used to resolve the conflict without timing.

In conclusion, the Commission should not order the use of 311 as a national, non-emergency number, but should pursue the alternatives noted above.

Respectfully submitted,

The NYNEX Telephone Companies

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